

### **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of July 14, 2004.

Reconsideration of the Application is requested.

#### **The Office Action**

Claims 1 - 23 remain in this application. Claim 24 - 26 have been canceled.

Claims 25 and 26 have been withdrawn from consideration as being directed to a non-elected invention.

Claims 1 – 23 stand rejected under 35 U.S.C. 102(e) as being anticipated by Robertson et al. (U.S. Patent No. 6,507,410).

#### **Brief Summary of Claim Amendments**

Claims 10, 11, 13 and 16 have been amended to further distinguish the claimed subject matter from the cited reference. The claims have been amended to more fully define the limitation of the network page or page content being dynamically and automatically incorporated into the document.

#### **Comments and Arguments**

The rejection of independent claim 1 is hereby respectfully traversed. The office action asserts that Robertson anticipates the subject matter of the present application as disclosed in claim 1. More specifically, the office action states that the step of "translating the PDL file into an image file representative of the page suitable for assembly into the document" is disclosed by Robertson, citing column 18, line 62 through column 19, line 37. The Applicants respectfully traverse the office action's assertion. Robertson does not teach or fairly suggest the claimed subject matter. Robertson does not disclose or fairly suggest importing the existing page from the network into the printing system, translating the existing page from the network into a page description language (PDL) file representative of the page and translating the PDL into an image file representative of the page and suitable for assembly into the document.

We now provide an example of how the claimed method may be used. An existing web page in a network is captured and imported into a document created using a document creation algorithm. The existing web page contains specific

content at the time it is captured, such as an advertisement. The web page is then translated into a PDL file (e.g., for immediate printing of the page) and converted into an image file for incorporation into the document. The image file maybe a GIF, JPEG, TIFF or any other human readable file format. After the web page has been incorporated into the document, anytime the document is printed the image file of the web page is dynamically and automatically updated with any current web page content, such that, if the document is printed now there maybe web page content containing an advertisement that only runs for the duration of the present day and that content will be printed. Two days later, if the document is printed, the advertisement may be altered in which case the document and image file will be dynamically and automatically updated and the new updated web page content (i.e., the updated advertisement will be printed).

In view of the above discussed distinctions and example, it is to be appreciated that Robertson fails to teach or fairly suggest translating the PDL file into an image file representative of the page suitable for assembly into the document. Rather, Robertson discloses a method for retaining physical hardcopy representations of hyperlinks and tags associated with an electronic source document in a reproduced hardcopy of the document. Furthermore, the method disclosed in Robertson takes information extracted from an electronically accessible source including referential links and incorporates them into a linear document which is stored or saved in memory. The document content and links are converted into internal references such that all connections with the external documents (i.e. web pages) are severed. The document is transferred to a printer, a cutter, a combination of printer-cutter or other equipment for producing the document on a hardcopy medium which is capable of printing the document and placing physical, functional hyperlinks within the document to show paths to other referenced parts of the document. The links are only internal and all references and connections to external web pages or web page content are separated. As mentioned, these hyperlinks may be in the form of tabs or cutouts found on the edges of the printed pages with printed images showing the physical paths of the hyperlinks within the linear document.

The method of the present application consisting of the steps of importing the existing page from the network into the printing system, translating the existing page from the network into a page description language (PDL) file representative of the

page, and the step of translating the PDL file into an image file representative of the page suitable for assembly into the document is neither taught nor fairly suggested in the disclosure of Robertson. For at least the reasons stated above independent claim 1 is distinguished and in condition for allowance. Furthermore, claims 2 – 7 which depend therefrom are also distinguished and in condition for allowance.

The rejection of independent claim 8 and claims 9 – 12 which depend therefrom are hereby traversed. The office action proposes that Robertson anticipates the method disclosed in independent claim 8. The Applicants respectfully disagree and submit that nowhere in Robertson is the method disclosed which comprises the steps of inserting a link into the document, said link corresponding to a page in the network, launching a browser in response to the link, retrieving the page from the network, translating the page into a PDL file, and converting the PDL file into an image file suitable for insertion into the document. More specifically, Robertson fails to teach or fairly suggest the steps of “launching a browser in response to the link” and “translating the page into a PDL file”. Rather, Robertson discloses a method for creating a linear document of web pages connected by hyperlinks which can then be reproduced into a hardcopy form which retains the virtual hyperlinks of the linear document by incorporating a physical hyperlink in the hardcopy. This physical hyperlink can be formed as finger cutouts or tabs which are positioned on the edges of the hardcopy medium with either printed arrows, symbols or highlights to define the hyperlink action. Furthermore, claims 8 – 12 of the present application teach a method of inserting a URL link into a document in order to capture a network page or network page content for incorporation into the document dynamically and automatically without user interaction. The concepts of these claims are neither taught nor fairly suggested in the disclosure of Robertson. Therefore, the Applicants respectfully submit that independent claim 8 and claims 9 – 12 which depend therefrom are distinguished and in condition for allowance.

The rejections of independent claim 13 and dependent claims 14 – 19 are hereby traversed. For similar reasons as discussed above, the Applicants respectfully submit that Robertson does not disclose the printing system of the present application. Nowhere in Robertson is there disclosed a printing system for converting an existing page from a network into image data suitable for subsequent, dynamic and automatic assembly into a document generated by a document

creation algorithm. The printing system of the present application captures and incorporates a network page or network page content into a document dynamically and automatically without user interaction. Therefore, when the document is printed, either concurrently or at a later time than when the network page was captured and incorporated into the document, the content of the network page at the time of printing is dynamically and automatically assembled into the document. This is accomplished by the system and method defined in the claims of the present application. Robertson, as disclose in column 10 lines 7 – 18, creates or defines a first document and copies or stores it in memory including all content and hyperlink attributes. The hyperlinks and pathnames are converted to internal references so that the document contains only self-consistent, internal hyperlinks with no connection to the external document (i.e. web/network page). The Applicants respectfully submit that independent claim 13 and claims 14 – 19 which depend therefrom are distinguished and in condition for allowance for at least the foregoing reasons.

Regarding claims 20 - 23, for the same reasons discussed above, the Applicants respectfully submit that independent claim 20, and claims 21 – 22 which depend therefrom, and independent claim 23 are distinguished and in condition for allowance.

**CONCLUSION**

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1 - 23) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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Date

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